

NOTICE OF THE OPPORTUNITY FOR PUBLIC COMMENT

GEORGIA DEPARTMENT OF NATURAL RESOURCES ENVIRONMENTAL PROTECTION DIVISION AIR PROTECTION BRANCH

STATE OF GEORGIA

COUNTY OF CHATHAM

NOTICE OF PSD PRELIMINARY DETERMINATION AND DRAFT PART 70 OPERATING PERMIT MODIFICATION

To All Interested Parties:

The Georgia Environmental Protection Division (EPD) announces its intent to issue Prevention of Significant Deterioration (PSD) Permit No. 4922-051-0263-V-01-0, which is also a Title V Air Quality Operating Permit, to Elba Liquefaction Terminal. The facility is located at 1 Elba Island Road, Savannah, Georgia. The facility will operate a natural gas liquefaction and exporting terminal collocated with the existing Elba Island LNG (importing) terminal.

The primary purpose of this permit is to allow construction of ten Moveable Modular Liquefaction System (MMLS) units, two heating medium heaters, two thermal oxidizers, one process flare system, one elevated marine flare, two diesel emergency generators, one fire water pump, and two storage tanks. The MMLS units will treat feed gas (natural gas) and cool it until it is liquefied and stored in the existing liquefied natural gas storage tanks at the LNG importing terminal. The heaters will provide heating medium to the feed gas heater, used to vaporize liquids (hydrocarbons or water trapped in), of each MMLS. The thermal oxidizers will treat the acid gases stripped from the feed gas. The process and marine flares will treat process exhaust from the MMLS units and inerted LNG vessels, respectively. The storage tanks will store recovered amine and heating medium. The Georgia Environmental Protection Division is preparing Title V Operating Permits in accordance with Title V of the Clean Air Act. This permit will be enforceable by the Georgia EPD, the U.S. Environmental Protection Agency (EPA), and other persons as otherwise authorized by law.

The draft permit, PSD Preliminary Determination, and all information used to develop the draft permit are available for review. This includes the application and all other relevant materials available to the permitting authority. This information is available for review at the office of the Air Protection Branch, 4244 International Parkway, Atlanta Tradeport - Suite 120, Atlanta, Georgia 30354. A copy of the application may also be available for review at Chatham County Superior Court, 133 Montgomery Street, Savannah, GA 31401 (Telephone: 912-652-7200), along with a copy of the draft permit and PSD Preliminary Determination. Electronic files of the application, draft Title V permit, PSD Preliminary Determination will be available through our internet site <http://www.georgiaair.org/airpermit/html/permits/psd/main.html>. (Please note that the Internet is generally accessible from most public libraries in Georgia.)

If copies are desired, a copying machine for public use is provided by EPD at the Atlanta Air Protection Branch office. There will be a copying charge of \$0.10 per page. Copies will be made on a first-come, first-served basis. Files are available for review and copying 8:30 a.m. to 4:00 p.m., Monday - Friday, excluding holidays.

You are hereby notified of the opportunity to submit written public comments concerning the draft Part 70 Operating Permit and the Preliminary Determination concerning the modification. The Preliminary Determination is a summary of the technical review of the application and contains a copy of the Company's application along with supporting documents and the draft Permit Amendment. The draft permit serves as both a draft PSD permit and a draft Part 70 permit. Persons wishing to comment on the draft Part 70 Operating Permit and Preliminary Determination are invited to submit their comments, in

writing, to EPD at the Atlanta address above, postmarked no later than 30 days after the date of publication in the newspaper. All comments postmarked on or prior to that date will be considered by the Division in making its final decision on the permit.

The Division has concluded that Elba Liquefaction Terminal's application should be approved and that a permit should be granted. This conclusion is based upon evidence that the proposed project will comply with the Division's Rules and Regulations for Air Quality Control, Chapter 391-3-1; that the emissions from the source will not cause or add to a violation of any applicable National Ambient Air Quality Standard (NAAQS) or Prevention of Significant Deterioration (PSD) increment; and will comply with the Federal PSD regulations, 40 CFR 52.21, including the use of Best Available Control Technology (BACT) for regulated pollutants.

The addition of the natural gas liquefaction and exporting terminal will increase emissions of nitrogen oxides (NO_x), sulfur dioxide (SO₂), volatile organic compounds (VOC), particulate matter (PM/PM₁₀/PM_{2.5}), carbon monoxide (CO), total greenhouse gas (Total GHG), single hazardous air pollutant (HAP, hexane), and combined HAP by approximately no greater than 39.5, 25.2, 34.9, 9.35, 150, 379,000, 2.18, and 2.30 tons per year, respectively. Net emission increases of NO_x, SO₂, VOC, and PM/PM₁₀/PM_{2.5} from the proposed project do not exceed the significant emission levels established by the PSD regulation. The net emission increases of CO and Total GHG from the proposed project exceed the significant emission levels established by the PSD regulation. The Division has determined that these emissions will not cause an adverse impact on ambient air quality, and the air quality levels should pose no significant health risk around the plant.

The PSD regulations allow specific maximum incremental increases in ambient concentrations of particulate matter (PM₁₀), sulfur dioxide (SO₂), and nitrogen oxides (NO_x). Since net emission increases of these pollutants do not exceed the associate PSD significant emission levels, no impact analyses is required for the proposed project. And EPD has concluded that the facility will not adversely affect the air quality (i.e., exceed the allowable incremental increases in ambient concentration of PM₁₀, SO₂, NO_x).

Similarly, Class I area analysis is not required because net emission increases of PM₁₀, SO₂, and NO_x do not exceed the associate PSD significant emission levels. With regard to the Class I Area (Wolf Island NWR, Okefenokee NWR, and Cape Romain NWR), the EPD has concluded that the facility will not adversely affect the air quality (i.e., exceed the allowable Class II and Class I incremental increase in ambient concentrations of PM₁₀, SO₂, NO₂).

Any requests for a public hearing must be made in writing within the 30-day public comment period. Such requests should specify in detail the portion of the Air Quality Control Rules which the individual believes may not have been adequately reviewed. A public hearing may be held if the Director of the EPD finds that such a hearing would assist the EPD in a proper review of the facility's capability to comply with the requirements of Federal and State Air Quality Control regulations. State laws specify that a permit shall be issued on evidence satisfactory to the Director of compliance with applicable State and Federal regulations and requirements.

Following the 30 day public comment period, as required by PSD and Part 70 regulations, a proposed amendment, incorporating any changes that result from comments received during the public comment period, will be made available to U.S. EPA and affected states. In accordance with Part 70 regulations, EPA Region 4 has a 45-day period in which to review this proposed permit amendment. Information pertaining to U.S. EPA's review period can be found on their website at www.epa.gov/region4/air/permits.

After the comment period has expired, the EPD will consider all comments, make any necessary changes, and issue the Part 70 Operating Permit and a Final Determination. Copies of the final Title V Operating Permit, Final Determination, comments received, EPD's responses to comments, and any other relevant information will then be made available for public review during normal business hours at the office of the Air Protection Branch, as well as at the Internet addresses given above.

For additional information, contact Mr. Eric Cornwell, Program Manager, Stationary Source Permitting Program, at the Atlanta address, or by phone at 404/363-7000. Please refer to this notice when requesting information.